

From: Scinta, Robert  
Sent: Tuesday, March 19, 2019 12:46 PM  
To: Mia, Marcia  
Subject: RE: Compliance Report Help

Hello Marcia,

Sounds good. I'll send the request out to the Branch and discuss it at the staff meeting to see who has time to help.

Bob

From: Mia, Marcia  
Sent: Tuesday, March 19, 2019 8:41 AM  
To: Scinta, Robert <scinta.robert@epa.gov>  
Subject: Compliance Report Help

Hi Bob

I was hoping to send out an email to the branch to see if anyone had any bandwidth to help with some oil and gas compliance report data mining. This is a short term project - about 3 days-worth of somewhat tedious, but important work, Ex. 5 Deliberative Process (DP) compliance monitoring. I would like to get it completed in the next week. The data may also be used Ex. 5 Deliberative Process (DP) Ex. 5 Deliberative Process (DP) Let me know what you think.

BACKGROUND:

EPA received a request from the Environmental Defense Fund (EDF) for the NSPS 0000a compliance reports so that they could "ground truth" two of our assumptions in the technical amendments package rulemaking for oil and gas:

That the emissions from fugitive components at low production wells site is different from non-low production well sites, because there are fewer components.

The estimated time that it takes to conduct a survey at any well site.

EDF didn't actually get those reports, they had to FOIA and that process is taking longer than we had rule open for comment.

Since we had the reports, we believed that we needed to conduct the analysis, both because it looked like worthwhile questions and because of the optics if we had the reports and didn't look ourselves.

The analysis will extract the well ID, survey time and number of leaking fugitive

components.

We will use the well ID to collect production data from drilling info and determine which are low production wells. We have contractor support for this effort. We will compare the count of leaks at non low production wells to the count of leaks at low production wells and see if there is a statistical difference.

For survey time, we will compare against our estimate of survey time.

I have created the templates, and uploaded the files to a sharepoint directory.

Marcia B Mia

Air Branch

Office of Compliance

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U.S. Environmental Protection Agency

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